

REMARKS

Claims 1-6 are pending. Claim 1 is the only independent claim. Reconsideration in view of the following remarks is respectfully solicited.

The Claims Define Patentable Subject Matter

The Office Action makes the following rejections:

(1) claims 1-5 are rejected under 35 U.S.C. §103(a) as being unpatentable over European Patent No. EP 0 949 571 A2 by Bickmore (hereafter Bickmore) in view of International Publication No. WO 00/39666 by Carlino et al. (hereafter Carlino) and further in view of European Patent Application EPO 0 938 052 A2 to Rossmann et al. (hereafter Rossmann); and

(2) claim 6 is rejected under 35 U.S.C. §103(a) as being unpatentable over Bickmore in view of Carlino in view of Rossmann and further in view of Nokia 5110 telephone User's Guide.

These rejections are respectfully traversed.

Applicant respectfully submits that the combination of references fail to teach or suggest the claimed invention. For example, the present invention is at least distinguished over each of the cited references in that all of the processing steps are performed by the hypertext display apparatus itself rather than by a separate apparatus from the network.

An advantage associated with the above-mentioned feature is that problems occurring during the step of assigning code to the units of link information can be avoided. For instance, one

such problem might be that the input sections of different hypertext display devices vary. Under such a scenario, it may be necessary to individually specify (depending on the respective input section design) how the assigned code has to be entered into the input section.

In contrast with the present invention, Bickmore merely discloses (in Figure 7, for example) that a request for a document is sent from a limited display area device to a host node, and a re-authored page is later returned.

Similarly, Carlino merely discloses (in Figure 1, for example) that a wireless device (12) sends a request to a wireless gateway (14) and later a converted response will be returned to the wireless device.

Furthermore, Rossmann merely discloses a similar configuration (see Figure 3) wherein a mobile device 142 is in communication with server device 144. For example, Rossmann discloses in paragraph [0020], line 5 that a microcontroller 128 initiates a communication session request to a server device using a module 124. A HDML deck is then received from the server device.

In the case of each of the systems disclosed by each of the cited references, it might be preferable to assign an individual code to an individual input button.

However, in the case of each of the cited references, such an assignment would have to be performed outside of the hypertext display apparatus. This would mean that the number of

buttons of the hypertext display apparatus may not be sufficient (too many links).

In contrast with the cited references, the presently claimed invention provides an apparatus which is self contained, thus ensuring that each link within a hypertext document can be assigned to a unique button (used to select the respective link) of the hypertext display apparatus since the hypertext display apparatus knows how many buttons are available.

None of the cited references disclose or suggest providing all of the processing functions in a single device, in order to achieve the advantages mentioned above.

As the Examiner will appreciate, it is a primary concern in the development of portable communication devices, to reduce the memory burden required to perform such processing tasks as those discussed in relation to the presently claimed invention. Therefore, since none of the cited references are concerned with the specific problems faced in the design of the present invention, it is difficult to see why one skilled in the art would simply modify any of these systems to carry out all of the functions of the presently claimed invention within the hand-held device itself.

Applicant respectfully submits that neither Bickmore, Carlino, Rossmann nor Nokia, taken singularly or in combination, (assuming these teachings may be combined, which applicant do not admit) teach or suggest providing all of the processing functions in a single device.

To establish a *prima facie* case of Obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP 706.02(j).

Applicant respectfully submits that the combination of cited references fail to teach or suggest each and every feature as set forth in the claimed invention.

Applicant respectfully submits that independent claim 1 is allowable over the cited art for at least the reasons noted above.

As for each of the dependent claims not particularly discussed above, these claims are also allowable for at least the reasons set forth above regarding their corresponding independent claims, and/or for the further features claimed therein.

Accordingly, withdrawal of the rejection of claims 1-6 under 35 U.S.C. §103(a) is respectfully requested.

Conclusion

In view of the foregoing, Applicant respectfully submits that the application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact Carolyn T. Baumgardner (Reg. No. 41,345) at (703) 205-8000 to schedule a Personal Interview.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment from or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §1.16 or under 37 C.F.R. §1.17; particularly, the extension of time fees.

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Respectfully submitted,

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